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Attorneys for Mowbray Waterman Property,  
LLC, Debtor and Debtor-in-Possession

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION**

In re:  
THE ORIGINAL MOWBRAY’S TREE  
SERVICE, INC., a Delaware corporation,  
Debtor and Debtor-in-Possession.

Lead Case No. 8:24-bk-12674-SC

Chapter 11

(Jointly Administered with Case Nos.  
8:25-bk-10542-SC and 8:25-bk-10543-SC)

In re:  
MOWBRAY WATERMAN PROPERTY,  
LLC,  
Debtor and Debtor-in-Possession.

**DECLARATION OF THOMAS BOONE IN  
SUPPORT OF QUALIFICATION AS GOOD-  
FAITH PURCHASER PURSUANT TO 11  
U.S.C. § 363(m) IN CONNECTION WITH  
THE SALE OF THE REAL PROPERTY  
LOCATED AT 386 S. ALLEN ST., SAN  
BERNARDINO, CA**

In re:  
ROBIN ELAINE MOWBRAY,  
Debtor and Debtor-in-Possession.

**Hearing (via ZoomGov):**

Date: December 17, 2025  
Time: 1:30 p.m.  
Place: Courtroom 5C  
411 West Fourth Street  
Santa Ana, CA 92701

- ☐ Affects THE ORIGINAL MOWBRAY  
TREE SERVICE, INC.
- ☒ Affects MOWBRAY WATERMAN  
PROPERTY, LLC
- ☐ Affects ROBIN ELAINE MOWBRAY
- ☐ Affects All Debtors

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1 I, Thomas Boone, declare as follows:

2 1. I am the Secretary and a director of Boone Trucking, Inc., a California corporation  
3 (the “Buyer”), the proposed buyer of the real property located at 386 S. Allen St., San Bernardino,  
4 CA 92408 (the “Property”). I know each of the following facts to be true of my own personal  
5 knowledge, except as otherwise stated and, if called as a witness, I could and would competently  
6 testify with respect thereto. I make this declaration in support of the *Motion for Order: (1)*  
7 *Authorizing Sale of Real Property Located at 386 S. Allen St., San Bernardino, CA Pursuant to 11*  
8 *U.S.C. § 363(b) and (f); (2) Approving Overbid Procedures; (3) Approving Buyer, Successful*  
9 *Bidder, and Back-Up Bidder as Good-Faith Purchasers Pursuant To 11 U.S.C. § 363(m); and (4)*  
10 *Authorizing Proposed Payment of Proceeds of Sale.*

11 2. Neither the Buyer nor any of its principals has any connection with the seller of the  
12 Property, Mowbray Waterman Property, LLC (the “Debtor”), or any of its principals. Neither the  
13 Buyer nor any of its principals is a creditor of the Debtor. None of the Buyer’s principals has ever  
14 spoken to the principals of the Debtor.

15 3. The Buyer has submitted its offer to purchase the Property in good faith. The Buyer’s  
16 broker negotiated the agreement to purchase the Property at arm’s length with the Debtor’s broker.  
17 Neither of us has colluded with anyone, including the Debtor or any potential bidders, for the  
18 purchase of the Property.

19 I declare under penalty of perjury that the foregoing is true and correct.

20 Executed on December \_\_, 2025. 2025-Dec-05 | 11:41 PST

DocuSigned by:

Thomas Boone

AA4FF0226F1B4FF...  
Thomas Boone

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
10345 Olympic Boulevard, Los Angeles, California 90064.

A true and correct copy of the foregoing documents entitled (*specify*): **DECLARATION OF THOMAS BOONE IN SUPPORT OF QUALIFICATION AS GOODFAITH PURCHASER PURSUANT TO 11 U.S.C. § 363(m) IN CONNECTION WITH THE SALE OF THE REAL PROPERTY LOCATED AT 386 S. ALLEN ST., SAN BERNARDINO, CA** will be served or were served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **December 11, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Shraddha Bharatia notices@becket-lee.com
- Jeffrey W Broker jbroker@brokerlaw.biz
- Kenneth J Catanzarite kcatanzarite@catanzarite.com
- Lauren N Gans lgans@elkinskalt.com, lmasse@elkinskalt.com
- Jessica L Giannetta jessica@giannettalawcorp.com, melanie@giannettaenrico.com
- Robert P Goe rgoe@goeforlaw.com, kmurphy@goeforlaw.com; goeforecf@gmail.com; Goe.RobertP.R@notify.bestcase.com; ajohnston@goeforlaw.com
- Marshall F Goldberg mgoldberg@glassgoldberg.com, jbailey@glassgoldberg.com
- Alan Craig Hochheiser ahochheiser@mauricewutscher.com, arodriguez@mauricewutscher.com
- Merdaud Jafarnia bkca@alaw.net, mjafarnia@ecf.inforuptcy.com
- Raffi Khatchadourian raffi@hemar-rousso.com
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- Robert S Marticello rmarticello@raineslaw.com, bclark@raineslaw.com; csantiago@raineslaw.com
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- United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov
- Sharon Z. Weiss sharon.weiss@bclplaw.com, raul.morales@bclplaw.com, REC\_KM\_ECF\_SMO@bclplaw.com, sharon-weiss-7104@ecf.pacerpro.com
- Jennifer C Wong bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com
- Mandy Youngblood csbk@gmfinancial.com

- Roye Zur rzur@elkinskalt.com,  
lwageman@elkinskalt.com;1648609420@filings.docketbird.com;rzur@ecf.courtdrive.com;lmasse@elkinskalt.com

**2. SERVED BY UNITED STATES MAIL:**

On (date) **December 11, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Hon. Scott C. Clarkson  
United States Bankruptcy Court  
411 West Fourth Street, Suite 5130  
Santa Ana, CA 92701-4593

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) **December 11, 2025**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

December 11, 2025 Lisa Masse  
*Date Printed Name*

/s/ Lisa Masse  
*Signature*